

As it stands now should LPAM become a reality, it will be DOA for Los Angeles County and most other areas in So. California. In fact it will be DOA for most metro areas throughout the United States.

The RM-10803 petition asks for the expanded band of AM frequencies to be reserved for LPAM. However the FCC is rapidly approving TIS stations all over the L.A. basin on the expanded band. While the Baumgartner petition acknowledges TIS stations, the mileage limits it suggests coupled with the proliferation of TIS stations in Los Angeles County (and surrounding counties) will make LPAM virtually impossible for So. California.

I respectfully suggest that either a moratorium be placed on these TIS stations until RM-10803 is ruled on or that the petition itself be amended so as to allow LPAM stations on any available channel on the AM band or the mileage limits as suggested in the petition be changed. The FCC must protect localism in broadcasting and not allow it to be choked out of urban areas.

Thank you.